

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

ALBERONYS CUEVAS, on behalf of himself
and all other similarly situated persons,

Plaintiffs,

V.

**CITIZENS FINANCIAL GROUP, INC., and
RBS CITIZENS, N.A. (d/b/a Citizens Bank)**

Defendants.

CIVIL ACTION

NO. CV-10-5582

UNOPPOSED MOTION
FOR PRELIMINARY APPROVAL OF SETTLEMENT STIPULATION

COME NOW the Plaintiffs in the above captioned matter, and the Plaintiffs in the following five matters recently transferred to this Court and consolidated under this case number:

Ross, et al. v. RBS Citizens, N.A., et al. (E.D.N.Y. No. 13-cv-4226-FB-RML) (hereinafter “*Ross*”)

Martin, et al. v. Citizens Financial Group, Inc., et al. (E.D.N.Y. No. 13-3871-FB-RML)
(hereinafter “*Martin*”)

Bell, et al. v. Citizens Financial Group Inc., et al. (E.D.N.Y. No. 13-cv-4073-FB-RML) (hereinafter “*Bell*”);

Lyons, et al. v. Citizens Financial Group, Inc., et al. (E.D.N.Y No. 13-cv-3919-FB-RML) (hereinafter “*Lyons*”); and

Watson v. Citizens Bank of Pennsylvania (E.D.N.Y. No. 13-cv-3917-FB-RML) (hereinafter “*Watson*”);

and hereby move this Court for an order granting preliminary approval to the Parties' Settlement Stipulation (*Cuevas* Doc. 83). The Defendants have reviewed this motion and supporting memorandum and do not oppose the requests made herein.

WHEREFORE, the Parties respectfully request that this Court enter the order (courtesy copy to be sent to chambers): (1) granting preliminary approval of the Global Settlement Stipulation; (2) provisionally certifying the proposed settlement classes under Rule 23(b)(3) in the *Cuevas* matter and *Watson v. Citizens Bank of Pennsylvania*; (3) appointing Donelon, P.C. and Winebrake & Santillo, L.L.C. as class counsel over all the consolidated cases; (4) appointing Alberonys Cuevas as class representative in *Cuevas* and Christine Watson as class representative in *Watson*; (5) approving the proposed notices to the class members attached as Exhibits A-F to the Settlement Stipulation; and (6) set a date for a fairness hearing and for final approval.

Date: October 3, 2013

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Certificate of Service

I hereby certify that a true and correct copy of the above was sent on October 3, 2013 pursuant to the service requirements of the ECF/CM for the Northern District of Illinois to the following:

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